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### Public Document

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L. Daniel Mullaney  
Assistant U.S. Trade Representative for Europe and the Middle East  
Office of the United States Trade Representative  
600 17<sup>th</sup> Street, NW  
Washington, DC 20036

Attention Mr. Mullaney:

UL appreciates the opportunity to submit comments in conjunction with the United States Trade Representatives (USTR) request for identification of policies and measures to increase US-EU trade and investment to support mutually beneficial job creation, economic growth, and international competitiveness. UL supports the formation of this working group in order to develop mutually beneficial solutions to overcome barriers to trade in goods and services between and within our respective markets. UL believes that work in this area should complement and build upon the progressive thinking already taking place under the U.S. – EU High Level Regulatory Cooperation Forum and Trans-Pacific Partnership (TPP) negotiations.

UL is a premier global independent safety science company with more than 117 years of history. Employing more than 9,000 professionals in over 100 countries, UL has five distinct business units- Product Safety, Environment, Life and Health Sciences, Knowledge Services and Verification Services – to meet the expanding needs of our customers and to deliver on our public safety mission. UL evaluates tens of thousands of products, components, materials, and systems for compliance to specific requirements, and enables manufacturers and the public at large to benefit from safety-standards compliant products. In 2011, an estimated 21 billion products in the global market carried the UL Mark. Our role as a product certifier and service provider for manufacturers gives us vast insight regarding regulatory barriers and other restrictions that negatively impact trade. Often, a lack of market access for entities like UL can impede trade flows.

#### Priority Actions

The following priority actions are critical for ensuring UL’s continued market access in Europe and for regulatory cooperation between the United States and the European Union.

- Build upon existing dialogues underway in the US-EU High Level Regulatory Cooperation Forum;
- Build upon existing commitments being undertaken by negotiating parties of the Trans Pacific Partnership (TPP);
- Ensure the European Union allows multiple accreditation paths for certification bodies to eliminate burdensome accreditation costs across EU member states and takes additional steps to strengthen the integrity of the CE Mark scheme;
- Facilitate regulatory alignment between the United States and the European Union for new and innovative technologies;
- Encourage deeper public-private partnership in high-level bilateral dialogues like the Transatlantic Economic Cooperation (TEC) to advance emerging issues like electric vehicles, Smart Grid, cybersecurity, and third country engagement.

Consider the provision of tax credits for small-and-medium sized companies for conformity assessment services.

UL would again like to thank the US Trade Representative for the opportunity to comment on ways to bolster jobs and growth in the United States and the European Union. UL strongly supports the United States and the European Union working together on emerging technologies, utilizing both public and private sector resources to facilitate the development of these sectors, addressing inherent safety issues, and identifying areas for regulatory convergence and standards harmonization to mitigate any unnecessary barriers to global and transatlantic trade. By addressing challenges early in the development cycle, the United States and Europe Union can avoid moving down separate paths and duplicating activity that could divide world-leading policy and innovation, or halt to development of these sectors all together.

UL is pleased to speak with the Federal Government further about this topic. If you have questions about this document, please do not hesitate to contact Jennifer Boger, Trade Manager, Global Government Affairs, at 202-296-7841 or [Jennifer.Boger@ul.com](mailto:Jennifer.Boger@ul.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Weeks".

Ann Weeks  
Vice President, Global Government Affairs